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October 19, 2020

Hon. Peggy Kuo
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Jonathan Rubenstein
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Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Joint Request for Permission to file Joint Discovery Plan on November 9, 2020

Dear Magistrate Judge Kuo:

At the September 30, 2020 Initial Conference, Your Honor directed the parties to submit a discovery plan after the pre-motion conference on Defendant J Capital Research USA, LLC's proposed Motion to Dismiss, which had been set for October 13, 2020. To that end, Your Honor included in the minute entry for those proceedings a direction to the parties to file a joint proposed discovery plan by October 19, 2020. Due to a conflict in the Court's calendar, Judge DeArcy Hall adjourned the pre-motion conference to November 2, 2020. The parties write jointly to request that the deadline by which to file the joint proposed discovery plan be extended to one week after that pre-motion conference: November 9, 2020.

Respectfully,

/s/ Jonathan Rubenstein

Jonathan Rubenstein
Counsel for Plaintiff NOVAGOLD Resources, Inc.

/s/ David Korzenik

David Korzenik
Counsel for Defendant, J Capital Research USA, LLC